

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

November 17 2021  
Ravi Subramanian, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) JOSE ALFREDO MALDONADO-RAMIREZ,  
(2) IRIS ADRIANA AMADOR-GARCIA,  
(3) MILDRED ADRIANA RAMIREZ-PEREZ,  
(4) AMADO PEDRO CASTILLO,  
(5) MARIO ALBERTO AMADOR-GARCIA,  
(6) JOSE NOLBERTO BERNAL,  
(7) FERNANDO ALCIDES LOPEZ-MENDEZ,  
(8) JUSTINO CRUZ-VICTORIO,  
(9) BAYRON EBERTO GARCIA-PEREZ,  
(10) DWAYNE DOUGLAS GEORGE,  
(11) JOSEPH TROY EASTON,  
(12) ANGELIQUE MARIE EASTON,  
(13) JERRY WAYNE KOHL,  
(14) DOUGLAS BRYAN HEALER,  
(15) BARBI DANAE BARNES,  
(16) PRESTON JOSEPH SMITH, and  
(17) CURTIS ROBERT GRIFFIN,

Defendants.

NO. CR21-174JCC

**FIRST SUPERSEDING  
INDICTMENT**

The Grand Jury charges that:

**COUNT 1****(Conspiracy to Distribute Controlled Substances)**

Beginning at a time unknown and continuing until on or about November 2, 2021, in King, Kitsap, Lewis, Mason, Pierce and Thurston Counties, within the Western District of Washington, and elsewhere, JOSE ALFREDO MALDONADO-RAMIREZ, IRIS ADRIANA AMADOR-GARCIA, MILDRED ADRIANA RAMIREZ-PEREZ, AMADO PEDRO CASTILLO, MARIO ALBERTO AMADOR-GARCIA, JOSE NOLBERTO BERNAL, FERNANDO ALCIDES LOPEZ-MENDEZ, JUSTINO CRUZ-VICTORIO, BAYRON EBERTO GARCIA-PEREZ, DWAYNE DOUGLAS GEORGE, JOSEPH TROY EASTON, ANGELIQUE MARIE EASTON, JERRY WAYNE KOHL, DOUGLAS BRYAN HEALER, BARBI DANA E BARNES, PRESTON JOSEPH SMITH, CURTIS ROBERT GRIFFIN and others known and unknown, did knowingly and intentionally conspire to distribute controlled substances, including methamphetamine, heroin, and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), substances controlled under Title 21, United States Code.

The Grand Jury further alleges that with respect to JOSE ALFREDO MALDONADO-RAMIREZ, IRIS ADRIANA AMADOR-GARCIA, MILDRED ADRIANA RAMIREZ-PEREZ, AMADO PEDRO CASTILLO, MARIO ALBERTO AMADOR-GARCIA, JOSE NOLBERTO BERNAL, FERNANDO ALCIDES LOPEZ-MENDEZ, JUSTINO CRUZ-VICTORIO, BAYRON EBERTO GARCIA-PEREZ, DWAYNE DOUGLAS GEORGE, JOSEPH TROY EASTON, ANGELIQUE MARIE EASTON, JERRY WAYNE KOHL, DOUGLAS BRYAN HEALER, PRESTON JOSEPH SMITH, and CURTIS ROBERT GRIFFIN, their conduct as members of the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts,

1 isomers, or salts of its isomers, in violation of Title 21, United States Code, Section  
2 841(b)(1)(A).

3       The Grand Jury further alleges that with respect to JOSE ALFREDO  
4 MALDONADO-RAMIREZ, IRIS ADRIANA AMADOR-GARCIA, BAYRON  
5 EBERTO GARCIA-PEREZ, JOSEPH TROY EASTON, ANGELIQUE MARIE  
6 EASTON, BARBI DANA E BARNES, and PRESTON JOSEPH SMITH, their conduct  
7 as members of the conspiracy charged in Count 1, which includes the reasonably  
8 foreseeable conduct of other members of the conspiracy charged in Count 1, involved  
9 1,000 grams or more of a mixture or substance containing a detectable amount of heroin,  
10 in violation of Title 21, United States Code, Section 841(b)(1)(A).

11       The Grand Jury further alleges that with respect to JOSE ALFREDO  
12 MALDONADO-RAMIREZ, IRIS ADRIANA AMADOR-GARCIA, MARIO  
13 ALBERTO AMADOR-GARCIA, JOSE NOLBERTO BERNAL, JUSTINO CRUZ-  
14 VICTORIO, and BAYRON EBERTO GARCIA-PEREZ, their conduct as members of  
15 the conspiracy charged in Count 1, which includes the reasonably foreseeable conduct of  
16 other members of the conspiracy charged in Count 1, involved 400 grams or more of a  
17 mixture and substance containing a detectable amount of Fentanyl, in violation of Title  
18 21, United States Code, Section 841(b)(1)(A).

19       The Grand Jury further alleges that with respect to DWAYNE DOUGLAS  
20 GEORGE, JOSEPH TROY EASTON, ANGELIQUE MARIE EASTON, and their  
21 conduct as members of the conspiracy charged in Count 1, which includes the reasonably  
22 foreseeable conduct of other members of the conspiracy charged in Count 1, involved 40  
23 grams or more of a mixture and substance containing a detectable amount of Fentanyl, in  
24 violation of Title 21, United States Code, Section 841(b)(1)(B).

25       All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

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**ASSET FORFEITURE ALLEGATION**

The allegations contained in Count 1 of this First Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of the offense alleged in Count 1 of this Indictment, JOSE ALFREDO MALDONADO-RAMIREZ, IRIS ADRIANA AMADOR-GARCIA, MILDRED ADRIANA RAMIREZ-PEREZ, AMADO PEDRO CASTILLO, MARIO ALBERTO AMADOR-GARCIA, JOSE NOLBERTO BERNAL, FERNANDO ALCIDES LOPEZ-MENDEZ, JUSTINO CRUZ-VICTORIO, BAYRON EBERTO GARCIA-PEREZ, DWAYNE DOUGLAS GEORGE, JOSEPH TROY EASTON, ANGELIQUE MARIE EASTON, JERRY WAYNE KOHL, DOUGLAS BRYAN HEALER, BARBI DANA E BARNES, PRESTON JOSEPH SMITH, CURTIS ROBERT GRIFFIN shall forfeit to the United States of America any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense, including but not limited to a sum of money reflecting the proceeds each defendant individually obtained as a result of the offense.

***Substitute Assets***

If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

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1 it is the intent of the United States, pursuant to Title 21, United States Code, Section  
2 853(p), to seek the forfeiture of any other property of the defendants, up to the value of  
3 the above-described forfeitable property.

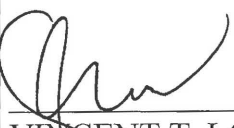
4  
5 A TRUE BILL:

6 DATED: 17 November 2021

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8 *(Signature of Foreperson redacted*  
9 *pursuant to the policy of the Judicial*  
10 *Conference of the United States)*

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FOREPERSON

  
NICHOLAS W. BROWN  
United States Attorney

  
VINCENT T. LOMBARDI  
Assistant United States Attorney

  
C. ANDREW COLASURDO  
Assistant United States Attorney

  
BENJAMIN DIGGS  
Assistant United States Attorney